



LOUISE M. SLAUGHTER
CONGRESS OF THE UNITED STATES
25TH DISTRICT, NEW YORK

816

October 5, 2016

Thomas Wheeler, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Wheeler,

It has come to our attention that the Federal Communications Commission (FCC), as part of its objective to develop a next-generation "video relay service" ("VRS") platform for deaf and hearing-impaired communication, is considering the establishment of a stakeholder consortium which would coordinate and conduct future research and development. As you determine what is the best course for the FCC in this endeavor, we want to express our hope that the expertise and leadership of the National Technical Institute for the Deaf (NTID) in both the original development, and next-generation development, of VRS technology, is fully utilized.

As you know, the National Technical Institute for the Deaf, a college of the Rochester Institute of Technology ("RIT"), is the world's first technological college for deaf students. NTID was established by Act of Congress in 1968 as the technological higher education sister institution of Gallaudet University and is funded, as is Gallaudet, by Congress on an annual basis. As members of the Congressional delegation representing NTID, we are justifiably proud of the work NTID has done over the past 50 years to provide a college education in a number of important technological and engineering fields, that leads to jobs and career advancement for deaf and hard-of-hearing students across the country. NTID is unquestionably a federal program that works.

As part of its secondary mission, NTID undertakes a program of applied research designed to enhance the social, economic and educational accommodation of deaf people. One of the most important strands of this research program is NTID's work on developing and adapting new technologies that allow deaf and hard-of-hearing individuals to access information on an equal basis with their hearing peers, thereby improving both their educational experience and employment prospects.

As you know, one of the most important technological advances of the last 15 years is the development of video relay service, which allows deaf and hearing individuals to communicate with each other by telephone on a functionally equivalent basis. VRS, whose provision and funding are regulated by the Federal Communications Commission (FCC), has enabled

significantly improved access to information that hearing individuals take for granted. As Chairman, you have worked hard to elevate this program's efficiency and service quality. On behalf of our many deaf and hard-of-hearing constituents in New York State, we are appreciative, as is NTID, of your efforts in this regard.

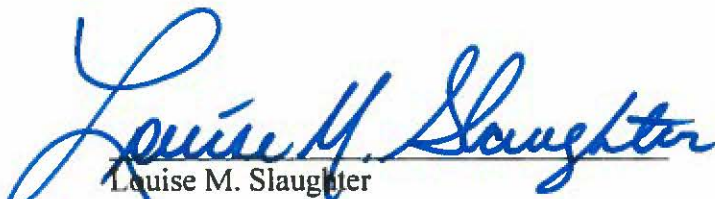
For more than a decade, VRS providers were allowed to claim reimbursement from an FCC-regulated fund for costs related to continued research and development, as well as for infrastructure and interpreting. We are aware that in recent years, the FCC has attempted to centralize these research and development efforts, most recently by contracting with a private company to develop a standard platform for all VRS calls. That company, VTCSecure, subcontracted with NTID for parts of the development of that critical project, which you unveiled at last summer's TDI Conference under the banner of Accessible Communications for Everyone ("ACE"). NTID established an ACE Laboratory on its campus to facilitate work on this project. We are aware that you had the opportunity to meet with some of NTID's student and faculty designers and developers on the project and see firsthand their dedication and expertise.

We also understand that the FCC recently ended its contract with VTCSecure earlier this year, and is now exploring, through a working group of stakeholders, including NTID, different ways to achieve the development of this standard platform.

As you decide upon a way forward for the ACE Program based on this working group's recommendations, we believe it is very important that the final decision recognizes that researchers at NTID, who have vast technical experience in this field and understand the unique challenges inherent in developing a coherent platform which will be acceptable to all users, should have the leadership role in future research and development efforts. Without such a leadership role, there is a risk that the R&D and investment already made by NTID and the federal government in VRS will be wasted and this effort disadvantaged from the outset.

We would appreciate receiving a report from you at your earliest convenience concerning the status of the ACE Project and options that are being considered concerning its leadership and mission going forward. We thank you for your attention to this matter of importance to our constituent institution.

Sincerely,



Louise M. Slaughter
Member of Congress



Chris Collins
Member of Congress



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

December 20, 2016

The Honorable Chris Collins
U.S. House of Representatives
1117 Longworth House Office Building
Washington, D.C. 20515

Dear Congressman Collins:

Thank you for your letter regarding the Commission's research and development efforts in connection with its video relay service (VRS) program. I share your desire to improve the communications services available to consumers with hearing and speech disabilities. And I appreciate your recognition of the Commission's work to elevate the VRS program's efficiency and service quality as part of the Accessible Communications for Everyone (ACE) initiative.

Taking on the historic communications challenges faced by Americans with disabilities has been and will remain at the forefront of the FCC's agenda, and we are continuing our work to address the needs of individuals who are deaf, hard of hearing, speech disabled and deaf-blind through ACE. With ACE, we aim to break down barriers to communications services, and through collaborative efforts with software developers, engineers, technologists, and organizations in the disabilities community, ensure that people who rely on telecommunications relay services (TRS), including VRS, have access to communications services that directly respond to their needs and interests and can more seamlessly communicate across TRS providers.

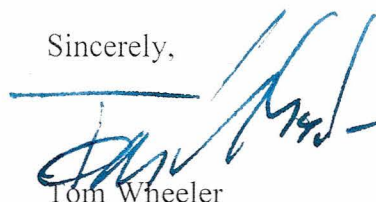
I am pleased to report that as part of the ACE initiative, we have had tremendous success in developing and promoting direct video communications (DVC), which allows individuals who use American Sign Language (ASL) to call and interact directly with customer service representatives without a communications assistant. Specifically, the Commission worked with a contractor to develop and release ACE Direct, an open source video contact center platform designed to work in customer call centers, so businesses and government entities can communicate directly with their customers, constituents, and beneficiaries using ASL over broadband facilities. We have integrated ACE Direct at the FCC, and have marketed the platform to the Equal Employment Opportunity Commission and the Small Business Administration, both of which now provide DVC. The Commission also recently hosted a public showcase to demonstrate ACE Direct to a variety of other organizations that handle a high volume of call center traffic, including telecommunications providers, financial institutions, and other entities. We plan to encourage additional government agencies and businesses to adopt DVC to improve communications services for individuals with hearing and speech disabilities and further reduce expenditures from the TRS Fund.

The Commission also continues to move forward with its efforts to achieve interoperability of video communications for people with hearing and speech disabilities so they can use VRS anytime with anyone using any VRS provider. Through the ACE initiative, we worked with contractors to develop and release an open source code for a prototype video call routing platform and an experimental software application that will enable interoperability testing. We plan to use these software tools to verify VRS provider compliance with FCC interoperability standards and ensure that consumers with hearing and speech disabilities can fully utilize modern video communication devices given to them by VRS providers. While achieving interoperability is the overarching objective of our efforts in this regard, utilizing the software as a compliance measurement tool will allow the FCC to generate cost savings for the TRS Fund by ensuring that providers are only reimbursed if they are in compliance with our interoperability rules.

As noted in your letter, the Commission has engaged the deaf and hard of hearing community regarding these efforts. For instance, after releasing the open source code for our interoperability testing tools to the public, the Commission encouraged the National Technical Institute for the Deaf (NTID) and others to take ownership of the software, perhaps as part of a consortium of entities interested in further developing and deploying these solutions themselves. Although we have taken a number of steps toward achieving our efficiency and service quality goals, we will continue to look for opportunities to work hand-in-hand with the deaf and hard of hearing community, including NTID. We value organizations such as NTID for their expertise, leadership, and understanding of the unique challenges facing consumers with hearing and speech disabilities, and we rely on their input to guide our decision-making on matters affecting this community. Doing so is vital to achieving our accessibility goals and ensuring the continued success of the ACE initiative.

Thank you for your interest in this important consumer matter. Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Wheeler", is written over a horizontal line. The signature is stylized and cursive.

Tom Wheeler



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

December 20, 2016

The Honorable Louise M. Slaughter
U.S. House of Representatives
2469 Rayburn House Office Building
Washington, D.C. 20515

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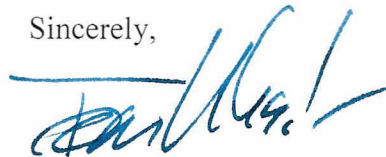
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Tom Wheeler